

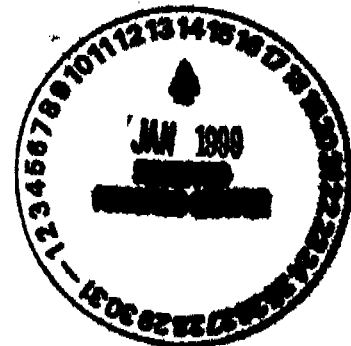


Department of Energy

ROCKY FLATS FIELD OFFICE
P.O. BOX 928
GOLDEN, COLORADO 80402-0928

DEC 23 1998

98-DOE-03901



Mr. Tim Rehder
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 500, 8EPR-FT
Denver, Colorado 80202-2466

Dear Mr. Rehder:

The U.S. Department of Energy Rocky Flats Field Office is pleased to transmit the *Draft Proposed Action Memorandum for the East Trenches Plume* for your review and comment. We have incorporated comments in this revision from your agency staff and from the Colorado Department of Public Health and Environment. The public comment period begins on December 23, 1998 and ends on January 22, 1999.

We appreciate your continued support in meeting our accelerated project schedules. If you should have any technical questions regarding this transmittal, please contact me at (303) 966-5918 or Norma I. Castaneda at (303) 966-4226.

Sincerely,

Joseph A. Legare
Assistant Manager
For Environmental Compliance

Enclosure

cc w/Enc:
G. Kleeman, EPA
C. Spreng, CDPHE
E. Pottorff, CPDHE
L. Carlson, USFWS
Administrative Record

ADMIN RECORD

BZ -B-00011

Tim Rehder
98-DOE-03901

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DEC 29 1998

cc w/o Enc:

A. Rampertaap, EM-45, HQ
B. April, RLG, RFFO
R. Tyler, ERWM, RFFO
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P. Plage, USFWS

Response to EPA and CDPHE Comments on the Draft East Trenches Plume Proposed Action Memorandum

Document Date - November 1998

Response to CDPHE Comments on the Draft East Trenches Plume Proposed Action Memorandum

Comment	Response
<p>1. The need for this project has not been adequately justified. No surface water samples at a point of evaluation or point of compliance have exceeded action levels. It is the possibility of future exceedances of surface water standards in the water column after active cleanup that must be prevented. For ground water action level exceedances, RFCA requires an evaluation "to determine if remedial or management action is necessary to prevent surface water from exceeding standards." If Tier I action levels are exceeded in a Tier II well, increased sampling frequency is triggered. If exceedances continue modeling is required to predict if "surface water action levels will be exceeded in surface water." Still missing from this evaluation are: estimation of the remaining source, calculation of the lifetime of the plume after source removal, and estimation of the concentrations expected over the lifetime of the plume. Characterization of ground water concentrations in the source area are known and performance monitoring wells are designed to collect information on the remaining plume. The pathway is well enough known that a simple model of this plume can be calibrated and used to predict lifetime and concentration of the plume. CDPHE has committed to perform this modeling with the assistance of technical from the Site by December 18, 1998</p>	<p>The CDPHE modeling was completed by December 18, 1998 and shows that the contaminant flux through the system is predicted to continue past Site closure.</p>
<p>2. Because of current pond management practice, contaminant migration in stream alluvium cannot be documented below pond B3. However, the likelihood of that migration occurring in a future management scenario can be evaluated using known hydrogeologic information. With or without this system, the concentration of volatile organics in the water column will be undetectable most of the time. It is not critical to know if contaminants are transferred to the surface water, but rather if they persist, and if the plume is expanding downstream in the alluvium.</p>	<p>The possibility of contaminant migration in the stream alluvium has been evaluated using the information provided in the OU 6 RFI/RI report. The text has been modified and an additional figure has been added to address the possibility of contaminant migration in the stream alluvium.</p>

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<p>3. Stakeholders should be provided with information to weigh the cost benefits of the project in the context of long-term stewardship of the site. This information cannot be provided without an estimate of how long this plume will continue to discharge to the South Walnut Creek drainage and without establishing performance requirements for the system. If the lifetime of the plume is modeled to exceed the period of active remediation at the Site, then this document should address the issue of continued funding for the maintenance and operation of the remedial system.</p>	<p>The alternatives analysis in Appendix A provides the information to the stakeholders to weigh the cost benefits of the project. While operations and maintenance costs were not provided, these are expected to be low cost and no further modifications to the alternatives analysis are planned. It is clear that the plume will continue to exist after active remediation is completed, and this has been added to the text. As stated in Section 6.0, the system is intended to operate until it can be proven that it is no longer required. The monitoring is funded as part of the Integrated Monitoring Plan Program and funding for outyear maintenance and operation of this system will be provided as part of the long term stewardship responsibilities of the Site. Long term monitoring requirements will be established as part of the Buffer Zone ROD. This has been added</p>
<p>4. Comments regarding construction issues were also not addressed in this document. Trenching on a hillside with known slumping during the highest ground water period of the year is questionable. Issues related to how the project may affect mouse habitat are also unresolved and may greatly restrict installation techniques and schedule.</p>	<p>The lessons learned during construction of the Mound Site Plume Project have been provided to the individuals responsible for installation of the East Trenches Plume groundwater collection and treatment system. Slumping and slope failure concerns will be addressed in several ways during project implementation including keeping only a portion of the trench open at any given time, and use of trench boxes as necessary. While this level of detail is important, it is more appropriate for the field implementation documents for the project than the decision document.</p> <p>There is the possibility of project impacts due to the nearby Preble's Mouse. While the project is not in Preble's Mouse habitat, there is a known population nearby. There are ongoing discussions and consultation with the Fish and Wildlife concerning this project, and several steps have been taken to mitigate possible impacts. These mitigating steps are detailed in Section 4.5. Any uncertainties with the Fish and Wildlife must be resolved prior to approval of this document.</p>